I am happy to provide comments to the committee for Assessing the Science Base for Tobacco Harm Reduction. First, however, I want to say that I am very glad to see the Institute undertaking this important evaluation. The involvement of the public health community is critical to the meaningful scientific evaluation of these products.

The committee has a variety of relevant expertise, as well as considerable credentials. To assist in the process, I would like to bring to your attention that, in addition to the clearly evident expertise, you check to insure that you have sufficient representation in analytic chemistry and toxicology of complex mixtures, as well as sufficient expertise in biochemistry and physiology. I mention these because:

- if modified tobacco products have reduced delivery of certain constituents, analytical methods for their measurement in a complex matrix like smoke are critical and difficult. Risk assessment of such reductions could be an important means of determining the potential effects of these reductions.
- research into smoke uptake, or uptake of individual constituents, (either in animals or humans) will also be complex. As you know, actual exposure is a key factor in evaluating biological effects.
- for new products with a short use history, it will be necessary to provide relevant short-term biological information. This, as you mention, will include the use of surrogate tobacco smoke markers. Knowledge of how to use animal and in vitro studies to predict eventual human health outcomes will be necessary, even to establish a research agenda for unanswered questions (e.g., cardiovascular disease).

In addition, it is not clear that you have scientists with in depth knowledge of cigarette design, tobacco processing, product manufacture and cigarette smoke. I understand that industry scientists are not allowed to participate (Rick, does this mean directly and/or indirectly?) on the committee. We are, therefore, available to you to share our knowledge, experience and expertise in product design and product performance, biological and chemical evaluation of cigarettes, and effective and ineffective tests for use in toxicological evaluation. We recently participated at Health Canada's request to perform such tasks. These efforts recently resulted in a publication (reference should be enclosed).

We depend on the reputation of the Institute and of the committee, and look forward to contributing to your efforts.

Denise
Please get
to Solana
RJR

Atch:
PM pubs list? yes
Health Canada citation? Yes

Rick , you might consider adding to your letter some quotes from the 96 and 98 Health Canada reports (see executive summary of 98 report on the important if not essential role of the tobacco industry in developing cigarette harm reduction with public health and government officials).

Source: https://www.industrydocuments.ucsf.edu/docs/pmlx0001